

# EXHIBIT 2

## Mark Jeffries

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**From:** Charles Crooks <charles@crookslawfirm.org>  
**Sent:** Tuesday, April 10, 2018 10:02 AM  
**To:** Rick Juckniess  
**Cc:** Mark Jeffries; Monte Williams  
**Subject:** Re: Release of Expunged records

Gentlemen,

I will get this done today.

Chas.

On Mon, Apr 9, 2018 at 4:41 PM Rick Juckniess <[rick@juckniesslaw.com](mailto:rick@juckniesslaw.com)> wrote:  
That is correct, though Charles will be handling the filings.

On Mon, Apr 9, 2018 at 4:35 PM, Mark Jeffries <[Mark.Jeffries@steptoe-johnson.com](mailto:Mark.Jeffries@steptoe-johnson.com)> wrote:

Rick,

I have no issue with the revisions you mentioned. Am I correct that you are going to make those revisions and file the motion and send the release to the Monongalia County Prosecutor's office? If so, I will withdraw the motion.

Thanks,

Mark Jeffries

304-933-8155

**From:** Rick Juckniess [mailto:[rick@juckniesslaw.com](mailto:rick@juckniesslaw.com)]  
**Sent:** Monday, April 09, 2018 12:11 PM  
**To:** Mark Jeffries  
**Cc:** Charles Crooks  
**Subject:** Re: Release of Expunged records

These look fine once we add to the beginning of each that: Scott Ballock, Plaintiff in the matter Ballock v. Costlow et al., Case No. 1:17-CV-00052-IMK-MJA, now pending in the United States District Court for the Northern District of West Virginia brings this motion by and through his undersigned counsel in connection with discovery in that matter.

We should also note that Scott Ballock was the named defendant in the action referenced, rather than identifying him as "Defendant."

With those revisions, I believe we can submit these subject to any further comment by Charles. Thanks.

On Thu, Apr 5, 2018 at 5:29 PM, Mark Jeffries <[Mark.Jeffries@steptoe-johnson.com](mailto:Mark.Jeffries@steptoe-johnson.com)> wrote:

Charles,

A release, motion to magistrate court, and proposed order are attached for yours and Rick's review. I worded them so that records will be sent to me, with the idea that I can Bates number the documents, stamp them "Confidential," and then forward copies to all counsel, rather than asking that the magistrate court and prosecuting attorney's office send out four copies.

Have a good evening,

Mark Jeffries

304-933-8155

**From:** Charles Crooks [mailto:[charles@crookslawfirm.org](mailto:charles@crookslawfirm.org)]

**Sent:** Thursday, April 05, 2018 2:21 PM

**To:** Mark Jeffries

**Cc:** Rick Juckniess

**Subject:** Re: Release of Expunged records

Mark,

If you will send me drafts today I will get back to you no later than tomorrow afternoon.

Thanks.

Chas.

On Wed, Apr 4, 2018 at 5:38 PM, Mark Jeffries <[Mark.Jeffries@steptoe-johnson.com](mailto:Mark.Jeffries@steptoe-johnson.com)> wrote:

Rick,

If Mr. Ballock will file a motion with the Magistrate Court and execute a release directed to the Prosecuting Attorney's office (I believe, based upon my reading of the statute, that we'll need separate documents directed to each office), then I don't think we need a stipulated order. I can simply withdraw the motion and we can take care of the process among ourselves. If you like, I can draft a proposed motion and release.

Thanks,

Mark Jeffries

304-933-8155

**From:** Rick Juckniess [<mailto:rick@juckniesslaw.com>]

**Sent:** Wednesday, April 04, 2018 2:13 PM

**To:** Mark Jeffries; Charles Crooks

**Subject:** Release of Expunged records

We will agree to a release. It appears that the proposed order can be simplified and adapted to be a stipulated order. If you would like to send us a revised version, we can review, make necessary changes, and approve for submission.

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Rick Juckniess  
302 E. Liberty St., Suite 203  
Ann Arbor, MI 48104  
(734) 707-1515  
Rick@Juckniesslaw.com



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